

**BUREAU OF WASTE PREVENTION
DIVISION OF PLANNING AND EVALUATION**

**BACKGROUND DOCUMENT AND TECHNICAL SUPPORT
FOR PUBLIC HEARINGS ON
PROPOSED AMENDMENTS TO
310 CMR 7.00 et seq.:**

**310 CMR 7.28
“NO_x Allowance Trading Program”**

**Regulatory Authority:
M.G.L. c. 111, Sections 142A through 142N**

March 26, 2003

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I. Introduction

In July 1999 and September 1999, the Massachusetts Department of Environmental Protection (DEP) proposed revisions to the Massachusetts State Implementation Plan (SIP) for ozone to establish a second phase of a NO_x Allowance Trading Program (see the July 1999 *Background Document and Technical Support for Public Hearings on Proposed Revisions to the State Implementation Plan For Ozone: Response to the "NO_x SIP Call" and the "OTC NO_x MOU," Including Amendments To 310 CMR 7.00 Et Seq.: 310 CMR 7.19 "RACT for Sources of Oxides of Nitrogen," 310 CMR 7.27 "NO_x Allowance Program," and 310 CMR 7.28 "NO_x Allowance Trading Program" and the September, 1999 *Supplemental Background Document for Public Hearings on Modifications to the July, 1999 Proposal to Revise the State Implementation Plan for Ozone, hereafter collectively referred to as the "1999 Background Document and Technical Support Document"*). On December 10, 1999, after incorporating comments received on the proposed revision, DEP promulgated the final NO_x Allowance Trading Program, 310 CMR 7.28, and submitted it to the U.S. Environmental Protection Agency (EPA) as a revision to the Massachusetts' SIP.*

The final NO_x Allowance Trading Program regulation established a Public Benefit Set-Aside (PBSA) Account that holds 5% of the total annual Massachusetts NO_x state trading program budget. Projects that qualify as energy efficient or renewable generation may apply for allowances from the public benefit set-aside account. DEP designed the public benefit set-aside to be a voluntary program that encourages generation of new renewable energy, and energy savings through energy efficiency projects by rewarding the owners of the projects with NO_x Allowances. Allowances can be traded to help offset the costs of the renewable energy project or the energy efficiency project. As previously stated in the 1999 Background Document and Technical Support Document, DEP recognizes that such technologies provide non-price benefits in the form of reduced effects on human health and the environment associated with the air, water, and land impacts of electricity generation, reduced costs to the states to comply with federal environmental requirements, and economic benefits associated with expenditures in local energy efficiency and renewable energy industries. As detailed in the existing regulation (7.28(6)(b)3), unused allowances in the public benefit set-aside account may be banked for future years. However, any banked allowances in excess of 5% of the total budget will be allocated to the existing budget units pro rata based on net control period electrical and useful steam output for that calendar year.

In the 1999 Background Document and Technical Support Document, DEP committed to establishing guidelines, in consultation with other state agencies, such as the Department of Telecommunications and Energy (DTE) and Division of Energy Resources (DOER), to develop the procedures for allocating allowances from the public benefit set-aside account. DEP has worked with DOER and DTE over the last year in developing the proposed amendments to the regulation. On November 19, 2002, DEP held an informal public meeting to solicit feedback on the proposed amendments to the regulation, specifically the allocation process. DEP received excellent feedback at the public meeting and allowed people an opportunity to submit any written comments or suggestions. Based on those comments, DEP made some changes to the proposed amendments to the regulation as described in this Background Document. This Background Document also explains why DEP did not include some of the suggested changes.

In addition, DEP is proposing amendments to 310 CMR 7.28(7), (11) and (13). These include amendments in response to EPA's amendments to the Continuous Emission Monitoring (CEM) regulations, 40 CFR Part 75.

DEP is proposing amendments to the regulation as part of a formal rulemaking process in accordance with M.G.L. chapter 30A. Through this rulemaking process, DEP is proposing the allowance allocation procedure for projects that qualify as either a Renewable Energy Project (REP) or an Energy Efficiency Project (EEP). DEP solicits comments only on the provisions put forth in this proposal, and

not on matters previously proposed in July 1999 or September 1999. Once comments are received, DEP will prepare and issue final amendments to the regulation and responses to all relevant comments received during the comment period.

Upon promulgation of the amendments to 310 CMR 7.28, DEP will submit the amendments to EPA as revisions to the Massachusetts SIP.

II. Description of Public Benefit Set-Aside Allocation Process

DEP intends to distribute the PBSA allowances to persons who own, lease, operate, or control either Renewable Energy Projects or facilities where Energy Efficiency Projects are implemented, as defined in the proposed regulation. Under the proposed regulation, DEP will accept only one application per Renewable Energy Project or Energy Efficiency Project and will allocate allowances only to that applicant. If DEP allowed more than one application to be submitted for a single project, DEP would need to decide which applicant is entitled to the allowances. This would not be administratively efficient, so only one application per project will be accepted. Each project may have one entity act as representative of the project. That means that if there is more than one project proponent, they will have to decide which entity will act as representative. The parties may independently choose to share the allowances once DEP allocates them. If DEP receives two applications for the same project, it will reject both applications and the two project proponents will have to decide which entity will resubmit the request for allowances.

DEP proposes to define Renewable Energy as electric energy generated in Massachusetts, by or from a unit using one of the following fuels, energy resources and/or technologies, provided that it does not emit NO_x: solar photovoltaic or solar thermal energy; wind energy; ocean thermal, wave or tidal energy; hydro and geothermal energy, and fuel cells that do not employ a fuel processor that emits NO_x. Hydro using pumped storage, nuclear, biomass and landfill gas are not considered fuels that qualify as renewable energy. Fuel cells that employ a fuel processor that emits NO_x are not within this definition. This definition is consistent with the definition of “renewable generation” in the Massachusetts Renewable Energy Portfolio Standard regulation, 225 CMR 14.00, except that it imposes the additional requirement that a source not emit NO_x in order to be eligible for PBSA allowances.

DEP proposes to define Renewable Energy Project, or REP, as one or more units generating renewable energy, located in Massachusetts, or directly connected to a pool transmission facility located in Massachusetts.

DEP proposes to define Energy Efficiency Project, or EEP, as the installation or implementation of one or more of the following energy efficiency measures: modifications, replacement or installation of equipment, fixtures or materials in a building or facility which directly result in energy savings, including, but not limited to, modifications to windows and doors, improving lighting technologies, and more energy efficient heating and cooling systems. The definition of EEP also includes Energy Conservation Measures and Energy Conservation Programs as defined in 225 CMR 2.02 and 225 CMR 4.02, each as in effect on March 1, 2003. EEPs do not include reductions in labor, load shifting, or measures that do not reduce energy savings directly. The EEP’s included in the proposed definition are similar to those on EPA’s list of potential eligible technologies for set-aside allowances included in Table 4 of EPA’s “Creating an Energy Efficiency and Renewable Energy Set-Aside in the NO_x Budget Trading Program: *Designing the Administrative and Quantitative Elements*, Draft Guidance, Volume 2,” (hereafter referred to as EPA’s Guidance).¹

¹ For a copy of EPA’s Guidance, go to http://www.epa.gov/appdstar/state_local_govnt/state_outreach/pdfs/2ndset-aside.pdf.

Only REPs or EEPs located in Massachusetts, or directly connected to a pool transmission facility located in Massachusetts, qualify for allowances because the NO_x Allowance Trading Program is applicable only to Massachusetts facilities. However, once a project proponent receives allowances under 7.28(b), he or she may trade the allowances with an owner of a facility located in another state, provided that state has a NO_x Allowance Trading Program approved by EPA. (Projects located in a state other than Massachusetts may apply for allowances in that state if it has its own public benefit set-aside program.)

Requesting Allowances From DEP. Starting in 2003, and each year thereafter, project owners may request allowances from DEP based on the amount of energy generated or saved during the preceding control period (defined in the existing regulation as the “ozone season”). In 2003, applications for public benefit set-aside allowances must be submitted to DEP by August 1st. For each year thereafter, all applications must be submitted to DEP by July 1st. The reason that the application deadline for the first year of the program is later than subsequent years is to allow interested persons enough time to prepare applications for allowances from the date DEP promulgates the amendments.

REP Quantifications. For REPs, an application for allowances must include the total amount of energy generated during the preceding calendar year’s control period. However, if the applicant does not have available monthly data specific to the control period, then the applicant may use the total amount of energy generated during the preceding calendar year multiplied by five-twelfths. For example, applications submitted in 2003 will be based on renewable energy generated May 1 through September 30, 2002. The renewable energy may be calculated either by actual measurement of renewable energy produced from May 1 through September 30, 2002, or by multiplying the total renewable energy produced in the calendar year 2002 by five-twelfths.

In order to ensure that REPs quantify electricity generation with a sufficient level of accuracy, the Department is proposing to require that REPs measure electrical output using metering equipment that meets the accuracy requirements found in NEPOOL’s Operating Procedure 18, or its successor. Electrical meters meeting the requirements of these procedures are used by electricity generators in New England as the basis for financial compensation and are therefore referred to as revenue-quality meters.

EEP Quantifications. For EEPs, an application for allowances must include the total amount of energy saved during the preceding calendar year’s control period. However, if the applicant does not have available monthly data specific to the control period, then the applicant may use the total amount of energy saved during the preceding calendar year multiplied by five-twelfths. EEPs fall into two categories: (1) rate-payer funded through the distribution charges prescribed by M.G.L. c. 25, § 19 (Funding for energy efficiency activities; mandatory charge per kilowatt-hour), and (2) privately funded.

For ratepayer funded EEPs, quantification of electrical energy saved will be based upon DTE’s annual verification of such projects using the Final Guidelines for Energy Efficiency Projects prescribed by the Department of Telecommunications and Energy, D.T.E. 98-100. For privately funded EEPs, quantification of electrical energy saved will be based on either the Final Guidelines for Energy Efficiency Projects prescribed by the Department of Telecommunications and Energy, D.T.E. 98-100 or the International Performance Measurement and Verification Protocol, March 2002; DOE/GO-102002-1554. DEP requests comment on whether the regulations should include other standard methodologies for quantifying energy saved.

Requests for allowances must include the allowance account number as established pursuant to the procedure contained in 310 CMR 7.28(8)(b) or (c). Existing budget units that qualify for PBSA allowances may request to have their allowances transferred to their compliance account.

A responsible official, as defined in 310 CMR 7.00, must certify in the request for allowances as to the truth and accuracy of the information included in the request. The responsible official is not an

independent third party. Project applicants are not required to have a professional engineer, architect or independent third party certify or verify the quantification included in the application. DEP believes that since the proposed regulation requires the quantification to be based on either accurate metering equipment and/or one of two methodologies, as certified by a responsible official, requiring an independent third person to verify the quantification is unnecessarily costly and excessive.

Formula For Allocating Allowances. By October 15th of each year, DEP will review the information submitted in the application and notify the project proponent of DEP's preliminary determination of the number of allowances earned from the project. Allowances will be allocated based upon DEP's review of the information submitted in the application and use of the following formula:

$$\text{Allowances} = E \times 1.5 / 2000.$$

E equals the total amount of energy generated, or saved and conserved, in Megawatt hours during either the preceding control period (May 1 to September 30) or the calendar year multiplied by five-twelfths. E is multiplied by a NO_x emission factor of 1.5lbs/MWh and then divided by 2000 lbs/ton (the factor for converting pounds into tons).

DEP will allocate allowances for REPs and EEPs by November 15th. The thirty-day period will allow project owners an opportunity to discuss with DEP any issues related to the preliminary determination of the number of allowances earned.

In their application, project proponents must quantify energy generation or savings using ozone season data, if available, since the NO_x Allowance Trading Program is an ozone season program. However, if the facility is unable to track monthly savings or generations, then the applicant may use the annual data multiplied by five-twelfths. EPA explains in its Guidance that tracking summer ozone season specific information usually involves obtaining monthly data from the May 1 through September 30 time frame that may be available for programs and projects that are in place and appropriately measured or metered. For example, using a new energy efficient air conditioner may result in energy savings, which mainly occur during the summer ozone season. However, for some projects, data on monthly generation or savings may not be available. For example, using more energy efficient computer equipment in a commercial business operation has an annual energy savings and may not be measured on a monthly basis. Converting annual savings and displacement amounts into summer ozone season savings may be used only when summer specific information is not available. In such cases, estimated annual savings may be apportioned into an estimate of energy savings during the summer ozone season by taking five-twelfths of the annual savings (the amount that correlates to the twelve months in the year divided by the five months of the summer ozone season). Using the five-twelfths factor allows the facility to approximate summer ozone season reductions.

The Megawatt hours (MWh) of energy generated or saved will then be multiplied by a NO_x emission factor of 1.5lbs/MWh (the rate, expressed in pounds per MWh, at which allowances are allocated) and then divided by 2000 lbs/ton (the factor for converting pounds into tons). A NO_x emission factor is used to convert energy savings into emission reductions. EPA recommends that states use a single SIP call region-wide NO_x emission rate of 1.5 lbs/MWh. This is the same emission factor that DEP uses in 310 CMR 7.28(6)(d) to calculate the number of allowances allocated to existing budget units and the same emission factor proposed by EPA and used by other states for allocating allowances from their public benefit set-aside accounts.

Similar to the allocation process for existing budget units, if there is an over subscription of allowances from the public benefit set-aside account, the allowances will be allocated pro-rata.

At this time, DEP has decided not to include in the formula for allocating allowances a multiplier to take into consideration power plant spinning reserves and transmission line losses since the multiplier would only be appropriate for energy savings projects. DEP believes that using the proposed formula is an equitable and simple approach and specifically requests comment on using this formula when allocating public benefit set-aside allowances.

Under the NO_x Allowance Trading Program, all allowances from the total budget are allocated, transferred, or used as whole allowances. To determine the number of allowances above one whole allowance, DEP will round down for decimals less than 0.5 and round up for decimals of 0.5 or greater. In order to qualify for allowances from the public benefit set-aside account, however, a project or aggregation of projects must equal at a minimum one whole allowance; DEP will not round up for projects that do not equal at least one whole allowance.

Project Aggregation. In some instances, individual projects may not amount to enough MWh of energy generated or saved to equal at least one whole allowance. (One NO_x Allowance = 1,333 MWhs.) Since DEP will not allocate allowances for projects that equal less than one whole allowance, a representative, who could be a common project owner, an energy service company, an emissions trading broker or a state agency, may assist project owners with aggregating eligible projects to equal at least one allowance. The representative must establish one account, pursuant to 310 CMR 7.28(8)(b) or (c), for each aggregated project. The Department will then allocate allowances earned from the aggregated project to the one account.

A person who owns both REPs and EEPs may aggregate the total amount of energy generated and saved when requesting allowances. Additionally, a person who owns more than one REP, or is implementing more than one EEP, located at different facilities in Massachusetts, may aggregate the projects when requesting allowances. For example, if a person owns an REP that generates enough energy for 9 allowances and owns an EEP that saves energy equal to 1 allowance, the project owner may request 10 allowances.

Allocation and Use of Allowances. By November 15th of each year, DEP will allocate current year NO_x allowances to the account specified in the application. That means that by November 15, 2003, DEP will allocate 2003 allowances for energy saved or generated in 2002. November 15th is the same date that DEP will allocate allowances to new budget units from the new unit set-aside account pursuant to 310 CMR 7.28(6)(c). DEP will not allocate allowances for any project that generated or saved energy prior to 2002.

Allowances allocated from the PBSA may be banked or traded pursuant to 310 CMR 7.28(9) and (10). Under the existing regulations, all existing budget units and new budget units must have in their accounts a number of allowances equal to the number of tons of NO_x emitted during the ozone season by the allowance transfer deadline of each year. Units have until November 30th (the allowance transfer deadline) to transfer allowances into their accounts. This fifteen-day period provides owners of REPs and EEPs an opportunity to trade their allowances to existing or new budget units. Alternatively, project owners may choose to bank their allowances and sell them in future years.

Subsequent Year Requests For Allowances. Following the initial request for allowances, project proponents of REPs may request allowances on an annual basis for each year that the project generates renewable energy. With respect to EEPs, owners of facilities that implement EEPs may request allowances for a maximum of seven consecutive years following the year the project was implemented. At the end of the seven years, a project proponent will not have an opportunity to apply for additional allowances unless a new EEP is implemented. EPA's Guidance suggests that a three-year award length accounts for the long-term benefits for most energy efficiency measures. DEP is proposing seven years because it believes that the average useful benefit of an EEP is seven years. It also provides more of an

incentive for facilities to implement EEPs since project owners may allocate the financial reward over a longer period of time. DEP requests comment on whether seven years is a reasonable amount of time for EEPs to qualify for allowances or whether a shorter or longer useful benefit term should be considered.

As part of the request for subsequent year allowances, project owners must provide DEP with an updated quantification of the amount of renewable energy generated in the case of REP's, or of energy saved in the case of EEP's during the preceding control period, (or calendar year multiplied by five-twelfths).

III. Proposed Regulatory Revisions to 310 CMR 7.28

Public Benefit Set-Aside. Along with this document, DEP is issuing for public comment the proposed regulatory revisions to 310 CMR 7.28. Consistent with modifications discussed in this document, DEP is proposing to add to 310 CMR 7.28 a definition for Energy Efficiency Project, Privately Funded Energy efficiency Savings, Ratepayer Funded Energy Efficiency Savings, Renewable Energy, Renewable Energy Project and Representative. In addition, DEP will amend 310 CMR 7.28(6)(b) to include the process for allocating public benefit set-aside allowances as described above in Section II.

Other Amendments. Along with the proposed amendments for the public benefit set-aside, DEP is proposing to amend 310 CMR 7.28(11)(a)2. so that new units must complete all applicable certification testing requirements for monitoring pursuant to the requirements of 40 CFR Part 75 Subpart H by the later of the following dates: May 1, 2002 or the earlier of: 90 unit operating days or 180 calendar days after the date the unit commences commercial operation. This change will ensure that the certification requirements in 310 CMR 7.28 are consistent with the revisions made to the federal 40 CFR Part 75 Continuous Emissions Monitoring regulations on June 12, 2002. The federal revisions were made because the original 90-calendar day timeline proved to be problematic, particularly for new units that experience mechanical problems when they first begin operating. The deferred unit timeline provides greater flexibility for new units.

DEP is proposing the following minor amendments to modify existing language in the NO_x Allowance Trading Program.

Amend 310 CMR 7.28(2) "New Budget Unit" definition by deleting the final phrase "or any prior year's control period." DEP is proposing this change because the last part of the definition could be interpreted as preventing DEP from allocating allowances from the new unit set-aside to certain new units in their second and third years under 310 CMR 7.28, before they become eligible to receive allowances as existing budget units. DEP did not intend to allocate allowances to new units only for an initial year, and then withhold allowances for subsequent years. Deleting the phrase is consistent with DEP's intent, as indicated in the 1999 Background Document and Technical Support Document.

Add the definition of "Administrator" based on the definition from 40 CFR 72.2: "Administrator means the Administrator of the United States Environmental Protection Agency or the Administrator's duly authorized representative."

Amend 7.28(7)(d)2.b. to correct two typographical errors.

Amend 7.28(13)(b) so that for budget units not using CEMS, electronic data reports must only be submitted for the ozone season portion of the second and third quarters of each calendar year, from May 1 to September 30. This change should be made because it is not clear in the current regulation that these units do not need to report April data.

Amend 7.28(13)(e) to give budget units an additional fifteen days to report to the Department each facility's metered net electrical and useful steam output for that year's control period.

IV. Request For Comments

DEP requests comments on the relative merits of DEP's proposed PBSA allocation process. In particular, DEP requests comment on:

- *Whether DEP should allow the earning of allowances based on generation or savings during the ozone season, if the data is available, and if the data is not available, based on annual data, multiplied by five-twelfths.*
- *Whether DEP should use an emission factor of 1.5 lbs/MWh to allocate allowances or use a higher or lower emission factor.*
- *Whether DEP should use seven years as the average useful life of an EEP or whether another period of time is more appropriate.*
- *Whether DEP should allocate allowances for energy generated or saved before 2002, and if so, on what basis and for what length of time.*
- *Whether DEP should allow the aggregation of projects that individually equal less than one whole allowance.*
- *Whether owners of privately funded energy efficiency projects should be required to have a CPA, PE, architect or other independent third party sign off on the quantification of energy saved as part of the request for allowances.*
- *Whether DEP should include other standard methodologies for quantifying energy saved.*

In addition, DEP solicits comments on any of the provisions set forth in this proposal.

V. Environmental Impacts

The environmental impact of this program would be an overall lowering of NO_x emissions and an improvement in air quality. The amendments to the regulation are designed to encourage generation of renewable energy and energy savings from energy efficiency projects by providing the owners of projects the opportunity to receive NO_x allowances that may be traded to earn money that will offset the costs of the project. The energy savings and renewable generation may also offset an increase in the rate of growth of demand for electricity from existing and new budget units. This may result in either a decrease in NO_x emissions or prevent an increase in NO_x emissions from existing or new budget units.

VI. Agricultural Impacts

Pursuant to the intent of Massachusetts General Laws, Chapter 30A, Section 18, state agencies must evaluate the impact of proposed programs on agriculture within the Commonwealth.

The proposed amendments to the NO_x Allowance Trading Program are not expected to have any significant negative impacts on agricultural production in Massachusetts. Minor positive benefits to agricultural production may accrue from reduced nitrification of water bodies, reduced acid deposition and reduced ozone.

VII. Impact on Massachusetts Municipalities, Proposition 2½

The proposed amendments to the regulation will not negatively impact cities or towns. The proposed amendments may have positive impacts on cities and towns that can earn allowances by

implementing energy efficiency projects in schools or other public buildings. These allowances may be sold to help cover the costs incurred from implementing the project.

VIII. Massachusetts Environmental Policy Act

This proposed action is "categorically exempt" from the "Regulations Governing the Preparation of Environmental Impact Reports," 301 CMR 11.00, because the proposed regulation will result in reduced levels of emissions. All reasonable measures have been taken to minimize adverse impacts.

IX. Impacts on Other Programs

A. Toxics Use Reduction

Implementation of toxics use reduction is a DEP priority. Toxics use reduction is defined as in-plant practices that reduce or eliminate the total mass of contaminants discharged to the environment. The proposed amendments to the NO_x Allowance Trading Program will assist this effort since the generation of renewable energy and reductions in energy demand should result in a reduction of demand from existing utilities or offset an increase in demand from existing utilities. This will result in a reduction of NO_x emissions and other toxic pollutants from these utilities.

B. Air Toxics

In the past, air pollution control programs have focused on the six criteria pollutants: particulate matter, nitrogen dioxide, sulfur dioxide, ozone, carbon monoxide, and lead. Recently, concern has been raised over certain components of air pollution that are not specifically regulated by programs developed to control criteria pollutants. These compounds are collectively known as air toxics. The health effects of air toxics are wide-ranging and can vary from long-term carcinogenic effects to short-term adverse health effects.

The Clean Air Act requires EPA to promulgate control strategies for sources of toxic air emissions. DEP implements those standards as EPA promulgates them. In addition, DEP controls air toxics through programs aimed at controlling the traditional criteria pollutants. The proposed amendments to the regulation are expected to result in a small reduction in emissions from utilities, therefore causing a small reduction of air toxics.

X. Public Participation

In developing this plan, DEP consulted with the Division of Energy Resources and the Department of telecommunications and Energy. DEP also consulted with stakeholders representing renewable generation projects and energy efficiency projects. Their input helped DEP shape its proposal to cover all of the possible EEP and REPS. DEP also conducted a public review of a draft of this regulation on November 19, 2002 to get input on the draft amendments to the regulation prior to the formal rule making process.

The proposed SIP revisions, including the proposed amendments to the regulation, are subject to public review and comment prior to finalization and promulgation. After public review, and DEP evaluation of and response to any comments, the final regulation will be submitted to the Secretary of the Commonwealth for promulgation. DEP will also submit the final regulation to EPA as a revision to the Massachusetts SIP for ozone.

As required by state law, DEP must give notice and provide the public at least 21 days after publishing the notice of the proposed amendments the opportunity for a public hearing and to provide comment. To assure more adequate notice for processing an amendment to the SIP and to comply with federal notice requirements, a formal notice is issued 30 days before the public hearings. Public hearings to collect comments on the proposed SIP revisions, including the proposed NO_x Allowance Trading Program, 310 CMR 7.28, will be conducted under the provisions of M.G.L. Chapter 30A on:

Date: May 7, 2003 at 1:30 p.m.
DEP - Western Regional Office
1st Floor, Room 303
436 Dwight Street
Springfield, Massachusetts

Date: May 8, at 1:30 p.m.
DEP - Boston Office
2nd Floor Conference Room
One Winter Street, Boston, Massachusetts

Testimony may be presented orally or in writing at the public hearings. Written comments will be accepted until 5:00 p.m. on May 19, 2003. Please submit comments to:

Eileen Hiney
Department of Environmental Protection
Bureau of Waste Prevention
One Winter Street, 8th floor
Boston, MA 02108
Attention: PBSA Comments

To ensure that your written comments are included in the hearing docket, please make sure that you address your comments to Eileen Hiney. Comments sent to other offices may not be received in time to be included in the official docket.

If there are any questions regarding this document, please contact Eileen Hiney (617-292-5520) at DEP's Boston Office, Bureau of Waste Prevention or Vincent Maraventano (617-292-5728) at DEP's Boston Office of General Counsel.